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April 4, 2024

Magistrate Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: State Farm Mut. Auto. Ins. Co., et al. v. Metro Pain Specialists P.C., et al.**  
**Case No.: 1:21-cv-05523-MKB-PK**

Dear Magistrate Kuo:

As Your Honor may recall, this firm represents defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (collectively "Defendants") in the above referenced matter. I am writing with regard to the status of Defendants' ESI production, and to request an extension of the April 8, 2024 deadline for Defendants' production of ESI responsive to the discovery demands of plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, "Plaintiffs").

On February 22, 2024, Your Honor held a conference regarding various discovery issues, including Defendants' ESI records responsive to Plaintiff's discovery demands. During the conference, I advised Your Honor that Defendants were in the process of retaining a third-party vendor to complete the collection and production of ESI. I also advised Your Honor that I anticipated the collection and production would be complete by April 8, 2024. Unfortunately, I underestimated the time the entire process would take. Retaining the third-party vendor took significantly longer than anticipated. Organizing and scheduling the collection of the information has also taken longer than anticipated, given the large number of defendants and ESI custodians.

Based on the foregoing, ***Defendants are requesting a forty-five (45) day extension of the ESI production deadline from April 8, 2024 to May 23, 2024.*** I discussed this extension request with counsel for Plaintiffs, and advised Defendants would agree to extend any additional deadlines

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if necessary as a result of this request. In response, Plaintiffs' counsel advised Plaintiffs take no position on the request.

Thank you for Your Honor's consideration.

Respectfully submitted,

*/s/ Anthony M. Juliano*

Anthony M. Juliano

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